

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

KNIFE RIGHTS INC., *et al.*,

Plaintiffs,

v.

MERRICK GARLAND, *et al.*,

Defendants.

Civil Action No. 4:23-cv-547-O

JOINT MOTION TO ENTER PROPOSED BRIEFING SCHEDULE

The parties respectfully request that the Court enter a stipulated schedule for briefing Plaintiffs' forthcoming motion for summary judgment and Defendants' forthcoming cross-motion to dismiss. A proposed order will be submitted separately.

Plaintiffs commenced this action on June 1, 2023, *see* ECF No. 1, challenging as unconstitutional 15 U.S.C. §§ 1242-43, which concern switchblade knives. On June 9, 2023, Plaintiffs completed service of process on the United States Department of Justice. *See* ECF No. 10.

On July 24, 2023, parties submitted a joint motion to enter proposed briefing schedule regarding Defendants forthcoming motion to dismiss Plaintiff's Complaint. ECF No. 14. This Court granted the parties' joint motion on July 25, 2023. Since this time, parties have met and conferred regarding Plaintiffs' intent to file a motion for summary judgment. The parties intend to adopt a similar briefing schedule for Plaintiffs motion for summary judgment previously granted by this Court for Defendants' motion to dismiss Plaintiffs' Complaint. Through this proposed schedule the Parties will be able to simultaneously brief the merits of their motions and their respective oppositions. As before, apart from Defendants' response to the Complaint, there are no other pending deadlines.

Accordingly, the parties have conferred and request that the Court adopt the following deadlines for briefing both Plaintiffs' and Defendants' prospective motions:

- On or before September 22, 2023, Plaintiffs will file their motion for summary judgment;
- On or before October 20, 2023, Defendants will file their opposition and Cross-Motion to Dismiss;
- On or before November 10, 2023, Plaintiffs will file their Opposition and Reply;
- On or before December 8, 2023, Defendants will file their Reply.

The parties also respectfully request that Defendants' deadline to respond to the Complaint be extended to October 20, 2023.

The parties appreciate the Court's consideration.

Dated: August 17, 2023

Respectfully submitted,

/s/ John W. Dillon
John W. Dillon
Attorneys for Plaintiffs

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

BRIGHAM J. BOWEN
Assistant Branch Director

/s/ Michael Drezner
MICHAEL DREZNER
Trial Attorney
U.S. Department of Justice
Civil Division, Federal Programs Branch
1100 L Street NW
Washington, DC 20005
Phone: (202) 514-4505
Email: Michael.L.Drezner@usdoj.gov

Attorneys for Defendants

CERTIFICATE OF CONFERENCE

The parties conferred and have agreed about the relief requested herein.

/s/ John W. Dillon
John W. Dillon
Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on August 17, 2023, I electronically filed the foregoing document with the Clerk of Court using this Court's CM/ECF system, which will notify all counsel of record of this filing.

/s/ John W. Dillon
John W. Dillon
Attorney for Plaintiffs